

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DISTRICT**

|                                     |   |                 |
|-------------------------------------|---|-----------------|
| <b>MICHAEL A. BRADY</b>             | ) |                 |
|                                     | ) |                 |
| <b>Plaintiff,</b>                   | ) |                 |
|                                     | ) |                 |
| <b>v.</b>                           | ) | <b>CASE NO.</b> |
|                                     | ) |                 |
| <b>HUMANA INSURANCE COMPANY AND</b> | ) |                 |
| <b>BLUE CROSS BLUE SHIELD</b>       | ) |                 |
| <b>HEALTHCARE PLAN OF</b>           | ) |                 |
| <b>GEORGIA, INC</b>                 | ) |                 |
|                                     | ) |                 |
| <b>Defendant.</b>                   | ) |                 |

**CORPORATE DISCLOSURE STATEMENT**

COMES NOW Defendant Blue Cross Blue Shield Healthcare Plan of Georgia, Inc. (“BCBSHP”) and files this Certificate of Interested Persons and Corporate Disclosure Statement, showing the Court as follows:

1. The undersigned counsel of record for a party to this action certifies that the following is a full and complete list of all parties in this action, including any parent corporation and any publicly held corporation that owns 10% or more of the stock of a party:

Blue Cross Blue Shield Healthcare Plan of Georgia, Inc. is a wholly-owned subsidiary of Cerulean Companies, Inc., which is a wholly-owned subsidiary of Anthem Holding Corporation, which is a wholly-owned subsidiary of WellPoint, Inc., which is a publicly traded corporation.

2. The undersigned further certifies that the following is a full and complete list of all other persons, associations, firms, partnerships, or corporations having either a financial interest in or other interest which could be substantially affected by the outcome of this particular case:

Blue Cross Blue Shield Healthcare Plan of Georgia, Inc.

Cerulean Companies, Inc.

Anthem Holding Corporation

WellPoint, Inc.

3. The undersigned further certifies that the following is a full and complete list of all persons serving as attorneys for the parties in this proceeding:

James P. Catalano, Esq.

Respectfully submitted, this 26<sup>th</sup> day of March, 2014.

**NELSON MULLINS RILEY &  
SCARBOROUGH, LLP**

**BY:** s/James P. Catalano  
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*Attorneys for Defendant Blue Cross Blue  
Shield Healthcare Plan of Georgia, Inc.*

**CERTIFICATE OF SERVICE**

I, the undersigned attorney, do hereby certify that the foregoing document has been served upon all counsel of record for the parties at interest in this cause by electronic notification through the Court's CM/ECF System and/or U.S. Mail, postage prepaid to:

Ivan D. Harris, Jr.  
352 Poplar View Lane East  
Collierville, Tennessee 38017

Errol J. King, Jr.  
Baker Donelson  
Chase North Tower  
450 Laurel Street  
20<sup>th</sup> Floor  
Baton Rouge, LA 70801

This the 26<sup>th</sup> day of March, 2014.

s/James P. Catalano  
**JAMES P. CATALANO**